

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA

VS.

ANTHONY SIMONE, SR.

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CR No. 12-180 M

MOTION TO TRAVEL

Now comes Anthony Simone, Sr., the defendant in the above captioned matter, and moves, pursuant to 18 U.S.C. §3142, for this court to allow him to travel to Tamarac, Florida from Saturday November 2 through Thursday November 7 for the purpose of assessing and beginning repairs to his sister's condominium that recently suffered flood damage. Mr. Simone presents neither a risk of flight nor a danger to the community and has been fully compliant with all conditions of pretrial release including each of the time he has been granted permission to travel.

In addition, Mr. Simone asks the court to amend his conditions of supervised release to allow his supervising probation officer authority to allow interstate travel rather than requiring Mr. Simone to file a motion with the court each time. This permission would save attorney and court resources and make it easier for Mr. Simone to accept contracting work in different areas.

The government, through A.U.S.A. Bill Ferland, has no objection to this request.

Respectfully submitted
Anthony Simone, Sr.
By his attorney,

/s/ Olin Thompson #5684
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CERTIFICATION

I hereby certify that a copy of this motion was delivered by electronic notification to William Ferland and Benjamin Towbin, Assistant United States Attorneys, on October 29, 2013

/s/ Olin Thompson